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December 6, 2019

BY ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007

USDC SDNY
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DATE FILED: 12-9-19

Re: Jaime Vargas Espino et al. v. 525 Grand Street, LLC, et al.
19-cv-335 (JGK)

Your Honor:

This firm represents the Plaintiff in the above-referenced matter. Plaintiff writes jointly with Individual Defendant's counsel to request an extension of the time to file pre-trial documents. The deadline is December 6, 2019, and the parties respectfully request a 30 day extension to file documents. The reason for this request is that while the parties have conferred and exchanged preliminary information, the parties require additional time to discuss disposition of this matter. Individual Defendant's counsel has stated his client has issues with his financial ability to pay. And, the two Corporate Defendants have never appeared nor answered. This is the first request for an adjournment.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Yolanda Rivero
Yolanda Rivero

cc: Mark D. Herman, Esq. (via email and ECF)
Attorneys for Defendant Alphonse Dipilato

APPLICATION GRANTED
SO ORDERED

12/9/19
John G. Koeltl, U.S.D.J.